

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

DAWN BISHOP MCLIN, Ph.D.

PLAINTIFF

V.

CIVIL ACTION NO. 3:25-cv-193-HTW-ASH

**JACKSON STATE UNIVERSITY,
THE MISSISSIPPI BOARD OF TRUSTEES OF
STATE INSTITUTIONS OF HIGHER
LEARNING, and MARCUS L. THOMPSON, Ph.D.**

DEFENDANTS

**DEFENDANT MARCUS THOMPSON’S
MOTION TO DISMISS AND FOR QUALIFIED IMMUNITY**

Defendant Marcus L. Thompson, Ph.D., (“President Thompson”), reserving all rights and defenses, asks this Court to dismiss McLin’s Complaint [Doc. 1] against him pursuant to Federal Rule of Civil Procedure 12(b)(6). In support, President Thompson states as follows:

1. President Thompson is entitled to qualified immunity;
2. McLin has not stated a procedural due process violation;
3. McLin has not stated a substantive due process violation;
4. McLin has not stated a plausible claim for tortious interference;
5. McLin has not stated a plausible claim for intentional infliction of emotional distress; and

6. McLin has not justified her request for emergency injunctive relief.

In support of his Motion, President Thompson relies on the pleadings and papers of record in this action and his Memorandum Brief submitted contemporaneously herewith.

FOR THESE REASONS, President Thompson respectfully moves this Court to dismiss Plaintiff’s claims against him in their entirety. President Thompson requests such other relief as the Court deems appropriate under the circumstances.

THIS, the 9th day of April 2025.

Respectfully submitted,

MARCUS L. THOMPSON, Ph.D.

/s/ J. Andrew Mauldin

POPE S. MALLETT (MB No. 9836)

J. ANDREW MAULDIN (MB No. 104227)

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